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6 Attorneys for Defendant
COSTCO WHOLESALE CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

11 ZOILA SIERRA, an individual,
12 Plaintiff,
13 vs.
14 COSTCO WHOLESALE CORPORATION, a
15 Washington Corporation; EDDIE, an
individual; and DOES 1-25, inclusive,
16 Defendants.

Case No.
[Alameda County Superior Court Case No.
RG21106297]

**DECLARATION OF SHARON C.
COLLIER IN SUPPORT OF
DEFENDANT COSTCO WHOLESALE
CORPORATION'S NOTICE OF
REMOVAL TO FEDERAL COURT
PURSUANT TO 28 U.S.C. § 1441(b)
[DIVERSITY]**

Action Filed: July 23, 2021
Trial Date: N/A

19 I, Sharon C. Collier, declare and state as follows:

20 1. I am an attorney licensed to practice in the State of California and am admitted to
21 practice before the United States District Court for the Northern District of California. I am a
22 Member of the law firm of Severson & Werson. This firm has been retained to represent
23 COSTCO WHOLESALE CORPORATION (“Costco”), which has been named as a defendant in a
24 civil matter venued in Alameda County Superior Court of California as Case No. RG21106297

25 2. I make this Declaration in support of Defendant Costco Wholesale Corporation's
26 Notice of Removal to Federal Court Pursuant to 28 U.S.C. section 1441(b) [diversity]. I have
27 personal knowledge of the matters set forth in this Declaration, and if called upon to do so, I could
28 and would testify competently to same.

1 3. Plaintiff ZOILA SIERRA (“Plaintiff”) filed a Complaint for compensatory
 2 damages on July 23, 2021 in Alameda County Superior Court. I understand the Complaint was
 3 served on Costco’s Registered Agent on February 3, 2022. A true and correct copy of the
 4 Summons and Complaint served on Costco is attached to the Request for Judicial Notice served
 5 herewith as **Exhibit A**.

6 4. Plaintiff served Defendant with a Statement of Damages on February 3, 2022. The
 7 Statement indicates that the damages claimed exceed \$75,000. A true and correct copy of this
 8 Statement is attached to the Request for Judicial Notice served herewith as **Exhibit B**.

9 5. Costco is contemporaneously filing an Answer to the Complaint in Case No.
 10 RG21106297 of the Alameda County Superior Court. A true and correct copy of the Answer is
 11 attached to the Request for Judicial Notice served herewith as **Exhibit C**.

12 6. Costco is the only named defendant to be served in this matter to date. I am not
 13 aware of Plaintiff effectuating service on the fictitiously named defendant, “Eddie,” or any other
 14 “Doe” defendants.

15 7. Costco Wholesale is a corporation formed and organized under the laws of the
 16 State of Washington. A true and correct copy of the Amended Statement of Designation by a
 17 Foreign Corporation evidencing Costco’s citizenship in the State of Washington is attached to the
 18 Request for Judicial Notice served herewith as **Exhibit D**.

19 8. Defendant Costco’s principal place of business is 999 Lake Drive, Issaquah,
 20 Washington 98027. A true and correct copy of the Statement of Information filed by Costco on
 21 June 27, 2019 with the California Secretary of State is attached to the Request for Judicial Notice
 22 served herewith as **Exhibit E**. This document evidences that Costco maintains its headquarters
 23 and principal place of business in the State of Washington

24 9. Plaintiff alleges she is a resident of the State of California in her Complaint.

25 10. Costco has been put on notice that Plaintiff allegedly sustained injuries to her
 26 person in the accident at issue, as alleged in the operative Complaint.

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1 11. Based on the allegations in the Complaint and the information disclosed in
2 Plaintiff's Statement of Damages, I believe the amount in controversy exceeds the jurisdictional
3 minimum of this Court.

4 12. Costco's Notice to Adverse Parties of Notice of Removal is being
5 contemporaneously filed in Case No. RG21106297 of the Alameda County Superior Court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This Declaration was executed on March 7, 2022, in Danville, California.

Sharon C. Collier